

Hearing Date and Time: January 20, 2010 at 9:45 a.m. (Eastern Time)
Objection Deadline: January 15, 2010 at 4:00 p.m. (Eastern Time)

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Co-Counsel for Shreveport Red River Utilities, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
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MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>,	:
	:
Debtors.	:
	:
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Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF MOTION OF SHREVEPORT RED RIVER UTILITIES, LLC
FOR ALLOWANCE AND PAYMENT OF POST-PETITION CLAIM AND
MOTION TO ENFORCE ADEQUATE ASSURANCE OF PAYMENT
AGREEMENT PURSUANT TO 11 U.S.C. § 366(c)**

PLEASE TAKE NOTICE that on November 24, 2009, Shreveport Red
River Utilites, LLC, by its counsel, filed the annexed *Motion of Shreveport Red River
Utilities, LLC for Allowance and Payment of Post-Petition Claims and Motion to Enforce*

Adequate Assurance of Payment Agreement Pursuant to 11 U.S.C. § 366(c) (the
“**Motion**”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held in connection with entry of an order granting the relief requested in the Motion and any further relief on January 20, 2010, 9:45 a.m. (Eastern Time), or as soon thereafter as counsel may be heard, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Room 621 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections and responses to the Motion must be in writing and must (a) conform to the Bankruptcy Code and Federal Rules of Bankruptcy Procedure, Local Rules of the Bankruptcy Court for the Southern District of New York, and any case management orders in these chapter 11 cases, (b) be filed electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system or by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with hard copy delivered directly to chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), with a hard copy delivered to chambers and (c) be served in accordance with General Order M-242 on (i) the Law Firm Of Russell R. Johnson III, PLC, 2258 Wheatlands Drive, Manakin-Sabot, Virginia 23103, Attn.: Russell R. Johnson III, Esq., John M. Merritt, Esq. co-counsel for Shreveport Red River Utilities, LLC; and (ii) Meyer, Suozzi, English & Klein, P.C., 990 Stewart Avenue, Suite

300, P.O. Box 9194, Garden City, New York 11530-9194, Attn.: Thomas R. Slome,
Esq., Jil Mazer-Marino, Esq. co-counsel for Shreveport Red River Utilities, LLC so as to
be received no later than January 15, 2010 at 4:00 p.m.

PLEASE TAKE FURTHER NOTICE that the relief requested in the
Motion may be granted without a hearing if no objection is timely filed and served.

Dated: Garden City, New York
November 24, 2009

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

By: /s/ Jil Mazer-Marino
Thomas R. Slome (TS-0957)
Jil Mazer-Marino (JM-6470)

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